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BEFORE THE ARIZONA CORPORATION ( RECEIVED

## **COMMISSIONERS**

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JEFF HATCH-MILLER, Chairman 2007 JAN 23 P 4: 17

WILLIAM A. MUNDELL MIKE GLEASON KRISTIN K. MAYES 5 **GARY PIERCE** 

AZ CORP COMMISSION DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR A HEARING TO DETERMINE THE FAIR VALUE OF THE UTILITY PROPERTY OF THE

COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF

RETURN THEREON, TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP SUCH 10 RETURN, AND TO AMEND DECISION NO. 67744.

DOCKET NO. E-01345A-05-0816 Arizona Corporation Commission DOCKETED

JAN 23 2007

**DOCKETED BY** NR

IN THE MATTER OF THE INQUIRY INTO THE FREQUENCY OF UNPLANNED OUTAGES

12 **DURING 2005 AT PALO VERDE NUCLEAR** 13

GENERATING STATION, THE CAUSES OF THE OUTAGES, THE PROCUREMENT OF

14 REPLACEMENT POWER AND THE IMPACT OF THE OUTAGES ON ARIZONA PUBLIC 15

SERVICE COMPANY'S CUSTOMERS.

IN THE MATTER OF THE AUDIT OF THE FUEL AND PURCHASED POWER PRACTICES AND COSTS OF THE ARIZONA PUBLIC SERVICE COMPANY.

DOCKET NO. E-01345A-05-0827

DOCKET NO. E-01345A-05-0826

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## MOTION TO EXTEND DUE DATE FOR RESPONSIVE BRIEFS

Arizona Corporation Commission ("Staff") hereby requests an extension of the due date for filing responsive briefs in this matter. Responsive briefs are currently due on February 5, 2007; Staff seeks to extend that deadline to February 16, 2007.

The opening briefs in this proceeding, filed on January 22, 2007, were somewhat longer than usual, presumably due to the length of the hearing and the corresponding length of the record. APS' brief, for example, is approximately 180 pages long. Responding to these briefs within the two-week time frame provided in the current procedural schedule will be very difficult for the Legal Division given current work loads and resource constraints.

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For this reason, Staff respectively requests that the Commission extend the deadline for filing 1 responsive briefs until February 16, 2007. Staff also requests expedited consideration of this motion. 3 RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of January, 2007. 4 5 stopher C. Kempley, Chief Counsel 6 Janet Wagner, Senior Staff Counsel Charles Hains, Attorney 7 Arizona Corporation Commission 1200 West Washington Street 8 Phoenix, Arizona 85007 (602) 542-3402 9 10 Original and 17 copies of the foregoing filed this 23<sup>rd</sup> day of January, 2007 with: 11 Docket Control 12 Arizona Corporation Commission 1200 West Washington 13 Phoenix, AZ 85007 14 15 Copy of the foregoing mailed this 23<sup>rd</sup> day of January, 2007 to: 16 Deborah R. Scott Michelle Livengood 17 Kimberly A. Grouse UniSource Energy Services 18 SNELL & WILMER One South Church Street, Suite 200 One Arizona Center Tucson, AZ 85702 19 400 East Van Buren Street Phoenix, AZ 85004-2202 Steven B. Bennett 20 Deputy City Attorney Thomas L. Mumaw City of Scottsdale 21 Karilee S. Ramaley City Attorney's Office 3939 North Drinkwater Boulevard 22 PINNACLE WEST CAPITAL CORPORATION Scottsdale, AZ 85251 23 Post Office Box 53999, MS 8695 Phoenix, AZ 85072-3999 George Bien-Willner 24 3641 North 39th Avenue Phoenix, AZ 85014 C. Webb Crockett Patrick J. Black 26 FENNEMORE CRAIG, P.C. 3003 North Central Avenue, Suite 2600 27 Phoenix, AZ 85012-2913

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